

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

JOE ANDREW SALAZAR,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 2:16-CV-01096-JRG-RSP
	§	
HTC CORPORATION,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT AGREED PROTECTIVE  
ORDER AND TO SERVE INITIAL AND ADDITIONAL DISCLOSURES**

Plaintiff Joe Andrew Salazar (“Salazar”) and Defendant HTC Corporation (“HTC”), file this Joint Motion for Extension of Time to Submit Agreed Protective Order and to Serve Initial and Additional Disclosures and as good cause supporting this Motion the parties respectfully show as follows:

1. Pursuant to the Court’s Order (Doc. No. 9), the current deadline for the parties to submit a proposed agreed protective order and to serve their respective initial and additional disclosures required by paragraphs 1 and 3 of the Discovery Order to be entered in this action is April 17, 2017.

2. Salazar and HTC jointly move the Court for an order granting a seven (7) day extension of time for the parties to submit their agreed proposed protective order and to serve their initial and additional disclosures, up to and including April 24, 2017. Grant of the requested extension will not unduly delay the orderly and expeditious preparation of this action for trial and such request is not sought solely for purposes of delay but only so that justice may be done.

3. Good cause is demonstrated for the grant of this requested extension in that the parties have not yet completed negotiations on the content of the proposed agreed protective order to be submitted to the Court today under the current deadline the parties are required to comply with. Completion of the parties' negotiations on the proposed agreed protective order have been delayed because of ongoing discussions between the parties on other case management orders that were also due for submission to the Court today and additionally by the fact that communications between Defendant and its trial counsel on the proposed agreed protective order for this action have been slowed as a result of Defendant's corporate headquarters being located in the country of Taiwan.

4. A proposed order granting the relief requested in this motion is attached for the Court's review.

WHEREFORE, Salazar and HTC jointly request the Court to extend the parties' deadline to submit a proposed agreed protective order and to serve their respective initial and additional disclosures, up to and including April 24, 2017 and for such other and further relief as the Court deems suitable and just.

Dated: April 17, 2017

Respectfully submitted,

A handwritten signature in blue ink that reads "Andy T. with permission of Lead Attorney".

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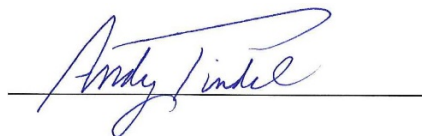
*Attorneys for Plaintiff Joe Andrew Salazar*

/s/ Trampas A. Kurth w/ permission  
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*Attorneys for Defendant HTC Corporation*

### **CERTIFICATE OF CONFERENCE**

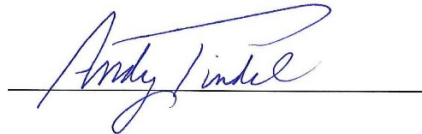
On April 17, 2017, undersigned counsel for Salazar communicated with Trampas Kurth, counsel for HTC, about extending the time for the parties to submit their agreed proposed protective order and to serve their respective initial and additional disclosures for a period of seven (7) days and the parties agreed to jointly move the Court for an order extending the time for submission of these filings for the requested seven (7) day period.

A handwritten signature in blue ink, reading "Andy Tindel", is written over a horizontal line.

Andy Tindel

**CERTIFICATE OF SERVICE**

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per E. Dist. Tex. Loc. Ct. R. CV-5(a)(3) on this the 17th of April, 2017. Any other known counsel of record will be served with a copy of this document by email and/or facsimile transmission

A handwritten signature in blue ink, reading "Andy Tindel", is written over a horizontal line.

Andy Tindel